



THE CITY OF NEW YORK
LAW DEPARTMENT

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The application is **GRANTED**. The initial pretrial conference scheduled for November 4, 2021, at 11:00 a.m. is **ADJOURNED to November 18, 2021 at 11:00 a.m.** The parties shall file a joint letter and proposed case management plan and scheduling order by **November 11, 2021**.

Dated: November 3, 2021
New York, New York

November 1, 2021

BY ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

A handwritten signature in black ink, appearing to read "Lorna G. Schofield", written over a horizontal line.

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: M.P. and A.P., individually and on behalf of A.P. v. New York City Department of Education, 21-CV-07439 (LGS) (SLC)

Dear Judge Schofield:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the Defendant New York City Department of Education in the above-captioned matter, in which Plaintiffs seek *inter alia* tuition funding for the Student A.P.'s private school placement for the 2019-2020 and 2020-2021 school years. I write jointly with Plaintiffs' counsel pursuant to the Court's Order dated November 1, 2021, and to respectfully request a short adjournment of the initial pre-trial conference currently scheduled for November 4, 2021.

By Order dated September 15, 2021, Your Honor scheduled the initial pre-trial conference and also directed the Parties to prepare and file a joint letter and a Proposed Civil Case Management Plan and Scheduling Order. The Order directed the Parties to do so seven calendar days prior to the initial pre-trial conference. The Parties overlooked this portion of the Court's order and did not timely file their proposed plan and order. We apologize for the oversight and any resulting inconvenience.

The Parties need additional time to prepare a proposed Order and draft the joint letter. Accordingly, the Parties respectfully request a short adjournment of the initial pre-trial conference date from November 4, 2021 to November 12, 2021, or any date thereafter that is convenient for the Court. I have communicated with Marc A. Gottlieb, one of Plaintiffs' attorneys, and as indicated above, this request is made jointly.

Thank you for your consideration of this matter.

Respectfully submitted,

s/
Alexandra L. Yacyshyn
Assistant Corporation Counsel

cc: Marc A. Gottlieb (via ECF)
Qian L. Wang (via ECF)
Gottlieb & Wang LLP
Attorneys for Plaintiff